

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

CARLA CALOBRISI,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:14-cv-00996-AJT-MSN
)	
BOOZ ALLEN HAMILTON INC.,)	
)	
Defendant.)	
_____)	

DEFENDANT’S MOTION IN LIMINE

COMES NOW Defendant Booz Allen Hamilton Inc. (“Booz Allen” or “the Firm”), by counsel and pursuant to Rule 26 of the Federal Rules of Civil Procedure and Local Rule 7(F), states as follows in support of its Motion *In Limine*.¹

The remaining issues before the jury who hears this case are whether: (1) Booz Allen discriminated against Plaintiff because of her gender or age when Mr. Appleby, in his role as the Firm’s General Counsel, decided in January 2011 to have Plaintiff head the Firm’s Real Estate practice group, and have two other women – Debra Storms and Karen Tinsky, assume leadership of the Firm’s Commercial and International practice areas; and (2) whether Booz Allen retaliated against Plaintiff when Plaintiff was presented with a memorandum memorializing the January 2011 change in her position from a Principal to a Senior Associate which resulted in her alleged constructive discharge. For the reasons set forth in the accompanying Memorandum of Law in

¹ As fully stated in Booz Allen’s Motion for Summary Judgment, which the Court has taken under advisement, the undisputed material facts warrant entry of judgment in favor of the Defendant on all of Plaintiff’s claims. Booz Allen submits this Motion in *Limine* without prejudice to the positions and arguments advanced in its Motion for Summary Judgment and to comply with the Court’s Scheduling Order. The arguments advanced below assume for the purpose of this Motion only, that Plaintiff’s claims will be presented to a jury.

Support of these Motions *in Limine* and those that may be presented at a hearing on this matter, the Court should grant the following Motions *in Limine*:

(1) Motion *in Limine* to exclude testimony at trial regarding Mr. Meyers' or Mr. Manya's work performance or work history;

(2) Motion *in Limine* to preclude Plaintiff from proffering testimony from "me too" witnesses (*Joan Hyde, Elizabeth Ewart, Molly Finn, Catherine Nelson, Diane Merolla, Deborah Sherman, Robin Shaffert, Velma Booth, Sheryl Jones, Eileen Kabay, Chimisa Walker, Valaree Moodee and Joyce Doria*) at trial who have no nexus to Plaintiff or her claims;

(3) Motion *in Limine* to bar Plaintiff from presenting testimony at trial regarding front or back pay pursuant to Defendant's after-acquired evidence defense; and

(4) Motion *in Limine* to preclude Plaintiff's economic expert, Joel Morse, Ph.D., from testifying about Plaintiff's purported economic losses as his opinions are not based upon sufficient facts or data as required by Rule 702 and were untimely supplemented in violation of the Court's August 27, 2014 Discovery Plan.

Defendant respectfully requests the Court grant these Motions *in Limine* and exclude the referenced evidence and testimony from the trial on this matter.

BOOZ ALLEN HAMILTON INC.

By Counsel

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the March 20, 2015, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send notification of such filing (NEF) to the parties listed below:

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I also certify that a true copy of the foregoing will be served via electronic mail and first class mail upon the following non-filing user:

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